## Case 1:12-cr-00871-CM Document 4 Filed 11/20/12 Page 1 of 4 ORIGINAL

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	X
UNITED STATES OF AMERICA,	: : INDICTMENT :
THOMAS SCOTT,  a/k/a "Tommy Guns," and	12 Cr.
KENYATTA MANZINI CKYYOU,  Defendants.	12 CRIM 871
	X

## COUNT ONE

The Grand Jury charges:

- 1. From at least in or about 2009, up to and including on or about October 22, 2012, in the Southern District of New York and elsewhere, THOMAS SCOTT, a/k/a "Tommy Guns," and KENYATTA MANZINI CKYYOU, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.
- 2. It was a part and an object of the conspiracy that THOMAS SCOTT, a/k/a "Tommy Guns," and KENYATTA MANZINI CKYYOU, the defendants, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance in violation of 21 U.S.C. § 841(a)(1).

Judge McMahon

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3. The controlled substance involved in the offense was one kilogram and more of mixtures and substances containing a detectable amount of heroin, in violation of 21 U.S.C. § 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

## Forfeiture Allegation

4. As a result of committing the controlled substance offense charged in Count One of this Indictment, THOMAS SCOTT, a/k/a "Tommy Guns," and KENYATTA MANZINI CKYYOU, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of said offenses and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense charged in Count One of the Indictment.

## Substitute Asset Provision

- 5. If any of the above-described forfeitable property, as a result of any act or omission of THOMAS SCOTT, a/k/a "Tommy Guns," and KENYATTA MANZINI CKYYOU, the defendants:
  - a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited

with, a third person;

- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. \$853(p), to seek forfeiture of any other property of SCOTT and CKYYOU up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

FOREPERSON

PREET BHARARA

United States Attorney

 SOUTHERN DISTRICT OF NEW YORK
UNITED STATES OF AMERICA,
<b>v</b> .
THOMAS SCOTT, a/k/a "Tommy Guns," and KENYATTA MANZINI CKYYOU,
Defendant.
INDICTMENT
12 Cr.
(21 U.S.C. § 846.)
 PREET BHARARA United States Attorney.
A TRUE BILL
 foreperson.